

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA,  
MONTGOMERY DIVISION**

**DARREN ANDERSON, et al.,**

**Plaintiffs,**

**v.**

**WAYNE FARMS, LLC.**

**Defendant.**

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**CIVIL ACTION NO.  
2:06-cv-00951-MEF-DRB**

**NOTICE OF FILING ADDITIONAL CONSENTS TO JOIN**

Plaintiffs give notice of filing the attached Notices of Consent to Join executed by, TOMMY MOTLEY, SARAH ANN RUMPH, KISSE G. REDDING, SHANA PRUITT and DENNIS A. GREY, similarly situated employees to Plaintiffs, who likewise are or were subjected to the illegal pay practices at issue, and who wish to join the above captioned lawsuit.

Dated: March 6, 2007

Respectfully submitted,

**THE COCHRAN FIRM, P.C.**

/s/ Robert J. Camp  
**ROBERT JOSEPH CAMP**  
505 North 20th Street, Suite 825  
Birmingham, Alabama 35203

(205) 930-6900-Telephone  
(205) 930-6910- Facsimile

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 2007, I electronically filed the above Notice with the Clerk of the District Court using CM/ECF System, which sent notification of such filing to:

Samuel A. Cherry  
Attorney for Plaintiffs  
[scherry@cochranfirm.com](mailto:scherry@cochranfirm.com)

Lance Harrison Swanner  
Attorney for Plaintiffs  
[lswanner@cochranfirm.com](mailto:lswanner@cochranfirm.com)

Bernard D. Nomberg  
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Lisa Sharp  
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Pepper Crutcher, Jr.  
Attorney for Defendant  
[Pcrutcher@balch.com](mailto:Pcrutcher@balch.com)

/s/ Robert J. Camp  
**ROBERT J. CAMP**

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Tommy Motley states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of Plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
07/1989 to Present  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 10 day of February, 2007.

Tommy Motley  
[PRINT NAME]

Tommy Motley  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Sarah Ann Bumph  
[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne's Farm at  
[Name of plant]  
the facility located in Union Springs AL. I worked at this location from  
[City/State]  
4/27/1989 to present.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne's Farm plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne's Farm. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of Sept, 2006.

Sarah A. Bumph  
[PRINT NAME]

Sarah Ann Bumph  
[SIGNATURE]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Kisse G. Redding states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of Plant]  
the facility located in Union Springs, AL I worked at this location from  
[City/State]  
01/01/2003 to Present  
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 10 day of Feb., 2007.

Kisse G. Redding  
[PRINT NAME]

Kisse G. Redding  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Shana Pruitt states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at  
[Name of Plant]  
the facility located in Union Springs I worked at this location from  
[City/State]  
Dec 2004 to Apr 2005.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 19th day of Feb., 2007. ad

Shana Pruitt  
[PRINT NAME]

Shana Pruitt  
[SIGN NAME]

**CONSENT TO JOIN SUIT AS PARTY PLAINTIFF**

**TO: CLERK OF THE COURT AND COUNSEL OF RECORD**

Dennis A. Grey states the following:  
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms LLC at  
[Name of Plant]  
the facility located in Union Springs, AL. I worked at this location from  
[City/State]  
March, 15, 2003 to Sept. 15, 2004.  
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms LLC plant in Union Springs, AL, and  
[Name of Plant] [City/State]  
possibly other plants owned by Wayne Farms LLC. If brought as a class  
[Name of Plant]  
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 16<sup>th</sup> day of February, 2007.

Dennis A. Grey  
[PRINT NAME]

Dennis A. Grey  
[SIGN NAME]